

Honorable Ronald B. Leighton

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

FREEDOM FOUNDATION, a Washington non-profit corporation,

Plaintiff,

v.

WASHINGTON STATE DEPARTMENT OF
LABOR & INDUSTRIES, a Washington
government agency, HEATHER NORMOYLE, in
her official capacity, JOHN DOES 1-5, in their
official capacities, and JANE DOE, in her official
capacity,

Defendants.

No. 3:19-cv-05937-RBL

**NOTICE OF COMPLIANCE WITH
DISCOVERY ORDER [ECF No. 53]**

The Plaintiff, FREEDOM FOUNDATION, by and through undersigned counsel and pursuant to the Court's Order [ECF No. 53] of July 14, 2020, hereby notes that the attorney's fees sanction of \$2500.00 has been paid to the Department of Labor & Industries, as of July 23, 2020, by check payable to the "Dep't of Labor & Industries," and sent via First Class U.S. Mail to Department of Labor & Industries, ATTN: Cashiers, P.O. Box 44835, Olympia, WA 98504-4835.

Notwithstanding its compliance with the Order [ECF No. 53], the Foundation hereby notes its objection to entry of the Order [ECF No. 53], specifically the award of sanctions, without an opportunity to be heard on that question. *See* Fed.R.Civ.P. 37(a)(5)(B). The Foundation would further observe that the admonition referenced by the Court (*see* ECF No. 53, at p. 6), was set forth in its previous Order on Motion to Compel Discovery [ECF No. 43], which previous Order was

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P.O. Box 552, Olympia, WA 98507
P: 360.956.3482 | F: 360.352.1874

1 entered May 7, 2020, and served upon the Foundation after the Motion to Compel as to Second
2 Set of Requests for Production [ECF No. 41] had been filed.

3
4 DATED this 27th day of July, 2020.

5 By: /s/ Robert A. Bouvatte, Jr.
6 Robert A. Bouvatte, Jr., WSBA # 50220
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28 *Counsel for Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who have entered appearances in this matter.

Signed at Olympia, Washington this 27th day of July, 2020.

s/ Robert A. Bouvatte, Jr.
Robert A. Bouvatte, Jr.

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No 3:19-cv-05937

NOTICE OF COMPLIANCE
No. 3:17-cv-05255

FREEDOM
FOUNDATION 
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